

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7243

WRITER'S EMAIL ADDRESS
christinechung@quinnemanuel.com

July 13, 2016

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Shiwei (Sheri) Yan*,
S2 15 Cr. 706 (VSB)

Dear Judge Broderick:

We represent defendant Shiwei (Sheri) Yan in the above-captioned matter. We write to request that the Court enter the enclosed proposed sealing order relating to emails cited in Ms. Yan's Sentencing Memorandum, filed on July 11, 2016. *See* Def.'s Sentencing Mem., July 11, 2016, ECF No. 219.

While Ms. Yan has no objection to the public filing of what are exclusively her own emails, *see id.* at 7 n.3, the emails also copy and reference third parties and relate to the government's ongoing investigation. We discussed the proposed sealing with the government prior to filing Ms. Yan's Sentencing Memorandum, and they concur in the treatment, at least for the present.

Accordingly, we respectfully request that the Court enter the proposed order permitting the emails cited in Ms. Yan's Sentencing Memorandum to be filed under seal.

We thank your Honor for your consideration of this request.

Very truly yours,



Christine H. Chung

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE
LONDON | TOKYO | MANNHEIM | MOSCOW | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS

Honorable Vernon S. Broderick

July 13, 2016

Page 2 of 2

Enclosure

cc: Daniel C. Richenthal, AUSA
Janis Echenberg, AUSA